

IN THE SUPERIOR COURT OF PIERCE COUNTY
STATE OF GEORGIA

RONALD LOTT, JR.,
Plaintiff,

vs.

RACHAEL ALDRIDGE,
Defendant.

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* Civil Action No.: 18-3a-CA
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PIERCE COUNTY GEORGIA
FILED IN OFFICE
JAN 26 2018
Clerk of Courts
Shaw in. Shaw

**PETITION TO LEGITIMATE MINOR CHILDREN
WITH CUSTODY AND VISITATION AND CHILD SUPPORT**

COMES NOW, Ronald Lott, Jr., Plaintiff in the above-styled action, and files this his Petition to Legitimate Minor Children with Custody, Visitation, and Child Support against Rachael Aldridge, Defendant, and shows this honorable court, as follows:

1.

Plaintiff is a resident of Coffee County, Georgia.

2.

Plaintiff is the father of one (1) minor child born out of wedlock, namely: a female child, Brooklyn Aldridge, born in January 2016.

3.

The natural mother of said children is Rachael Aldridge, who resides in the County of Pierce, State of Georgia and has for a period of six (6) months or longer. Defendant may be served at the following address: 3951 Rufus Road, Mershon, Georgia 31551.

4.

Plaintiff shows he was present for the Defendant's pregnancy and birth of the minor child. Further Plaintiff shows that it is in the best interest of the minor child for him to be legally declared the legitimate father of the minor child, to wit: Brooklyn Renee Aldridge, born in January 2016 and be capable of inheriting from the Plaintiff in the same manner as if born in lawful wedlock.

5.

Plaintiff shows that certain circumstances have materially changed that affect the minor child's best interest.

6.

Plaintiff shows that the Department of Family and Children Services ('DFACS') removed the child from the Defendant's home and placed the minor child in his custody. A copy of the safety plan is attached hereto.

7.

Defendant does not have suitable housing or electricity at her home. Defendant is currently using methamphetamines.

8.

Plaintiff shows that it is in the best interest of the minor child to grant temporary and permanent sole legal and physical custody of the minor child to Plaintiff.

9.

Plaintiff shows that Defendant should be awarded supervised visitation with the minor child.

10.

Plaintiff shows that he should be awarded child support by the child support guidelines.

11.

This Petition is brought pursuant to O.C.G.A. § 19-7-22 to legitimate said child.

WHEREFORE, Plaintiff requests:

- (a) That process issue and Defendant be served with a copy of Plaintiff's Summons and Petition to Legitimate Minor Children with Custody, Visitation and Child Support;
- (b) That said child, to wit: Brooklyn Renee Aldridge born in January 2016 be legitimized and deemed the legitimate child of Plaintiff;
- (d) That Plaintiff be temporarily and permanently awarded sole legal and sole physical custody of the minor child.
- (e) That Defendant be awarded supervised visitation;
- (f) That Plaintiff be awarded child support by the child support guidelines;
- (g) That Plaintiff be awarded such other and further relief as the court deems appropriate under the circumstances.

Respectfully submitted this 23rd day of January, 2018.

METTS LAW FIRM, P.C.



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IN THE SUPERIOR COURT OF PIERCE COUNTY
STATE OF GEORGIA

RONALD LOTT JR.

Plaintiffs,

v.

RACHAEL ALDRIDGE,

Defendants.

Civil Action No. 18-32-CA


VERIFICATION

Defendant, RONALD LOTT JR, personally appeared before me the undersigned officer duly authorized to administer oaths, who after first being sworn states that the information in the foregoing COMPLAINT FOR CHANGE OF CUSTODY is true and accurate.


RONALD LOTT JR.

NOTARY:



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Georgia Safety Plan

Date of Plan: 1-15-2018

Case Name: Rachel Aldridge

☒ Present Danger Safety Plan☐ Impending Danger Safety Plan

Protection strategies utilized to manage or control safety threats:

☐ In-Home Safety Plan☒ Out of Home Safety Plan

Reasonable Efforts Checklist

For each safety threat identified, consider the resources available in the family and community that might help to keep the child safe. Select all applicable responses utilized to protect each child.

- ☒ Use family resources, neighbors or individuals in the community as safety providers.
☐ Use the community agencies or services as safety providers.
☐ The alleged maltreater leaves the home, either voluntarily or through legal action.
☐ Have the non-maltreating caregiver move to a safe environment with the child.
☐ Have the caregiver(s) place the child outside the home.
☐ Legal action must be taken to place the child outside the home.
☐ Other:

Brooklyn
1-17-2018

Safety threat: Inadequate supervision

Strategy to address safety threat (specify responsibilities and timeframe for strategy): Mr. Ron Lott will provide care/supervision for child Brooklyn pending investigation by agency

Safety threat: Inadequate supervision

Strategy to address safety threat (specify responsibilities and timeframe for strategy): Mr. Ron Lott will ensure Brooklyn receives all routine/emergency medical care while in his care.

Safety threat:

Strategy to address safety threat (specify responsibilities and timeframe for strategy): Mr. Ron Lott agrees to contact agency/LE if Bmo Rachel Aldridge attempts to remove Brooklyn from his care/home.

Safety threat:

Strategy to address safety threat (specify responsibilities and timeframe for strategy):

Date discussed with caregiver(s): 1-15-18 Caregiver(s) agree with plan? Yes ☒ No ☐

Date copy of plan provided to caregiver: 1-15-18

Caregiver: _____

Caregiver: _____

Safety Provider: _____

Safety Provider: _____

Case Manager: _____

Supervisor: _____

Date: _____

Date: _____

Date: 1/15/18

Date: _____

Date: 1/15/18

Date: _____